Discovery Clean Water Alliance

Industrial Pretreatment Program

Annual Report

2024

Discovery Clean Water Alliance
Industrial Pretreatment Program
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OBJECTIVES

The objectives of the Discovery Clean Water Alliance Industrial Pretreatment Program are:

- To protect the Publicly Owned Treatment Works (POTW) from potential harm by establishing clear standards and requirements for pretreatment of non-domestic waste. Harm to be prevented includes causing interference or otherwise harming the POTW, causing pass-through or otherwise harming the receiving environment, or causing the POTW to respond to a Discharge based on a real or perceived threat.

- To protect POTW staff who may be affected by wastewater and sludge in the course of their employment and to protect the general public.

- To promote the reuse and recycling of Industrial Wastewater by Industrial Users.

- To provide high-quality end products, such as reclaimed water and biosolids from the POTW, for beneficial use.

- To provide for fees for the equitable distribution of the cost of operation, maintenance, and improvement of the POTW as economically feasible.

- To enable the Alliance to comply with its National Pollutant Discharge Elimination System permit conditions, sludge use and disposal requirements, and any other Federal or State laws to which the POTW is subject.

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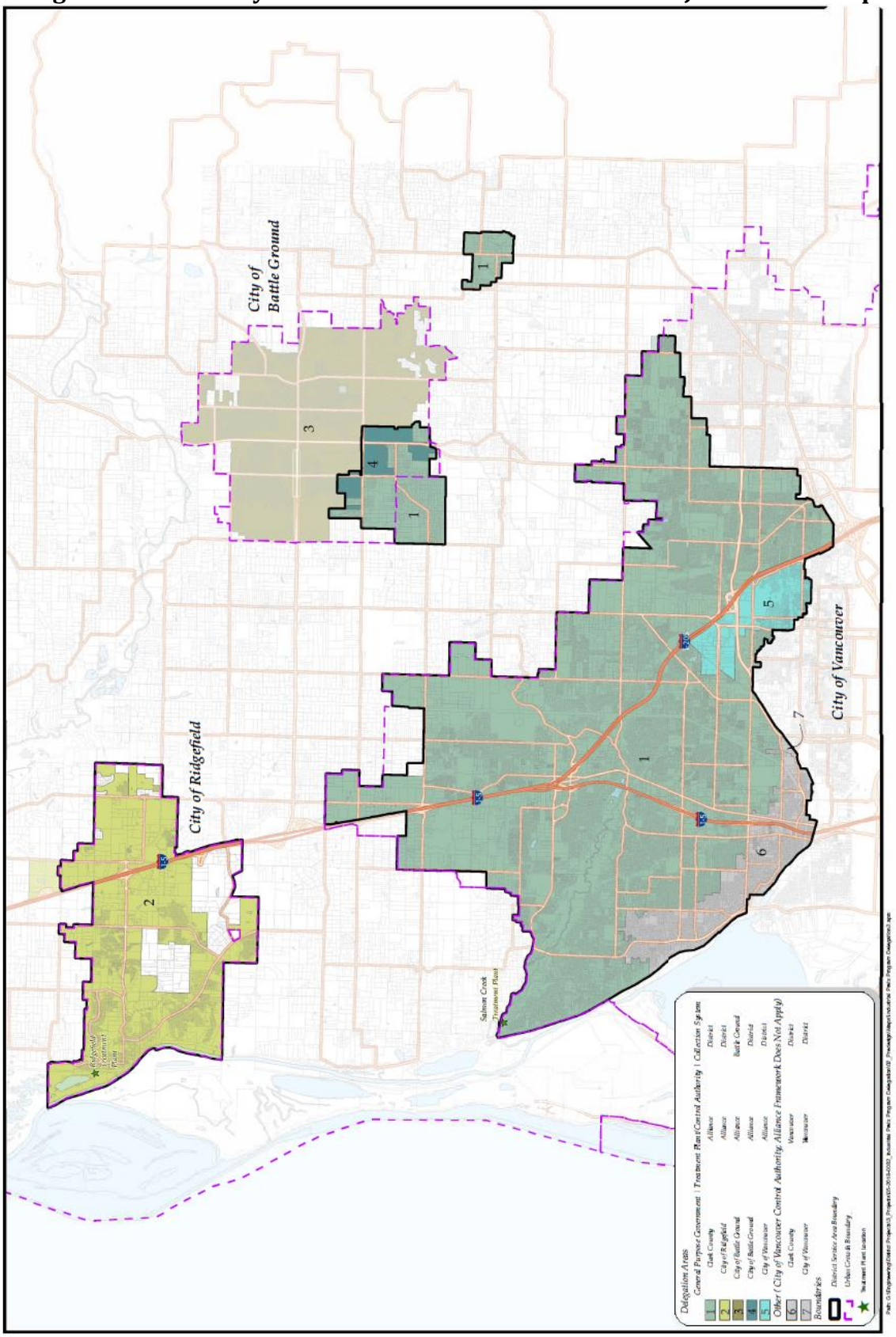
PROGRAM SUMMARY

INTRODUCTION

On January 1, 2023, the Discovery Clean Water Alliance (Alliance) was delegated authority by the Washington State Department of Ecology (Ecology) to implement an Industrial Pretreatment Program (IPP). The Alliance is an interlocal partnership that provides regional wastewater transmission and treatment services for its Members: Clark Regional Wastewater District (District), Clark County, the City of Ridgefield, and the City of Battle Ground. The Alliance contracts with the District to perform administrative services, including oversight of the IPP, as well as operations of the two Alliance wastewater treatment plants and other regional assets. The District administers the IPP throughout the Alliance service area in accordance with the Alliance Pretreatment Regulations and the Interlocal Agreement among the Alliance, the District, and the City of Battle Ground. The District also has an Interlocal Agreement with the City of Vancouver to address the area of the District that flows to the City-owned Westside Treatment Plant, which is not part of the Alliance IPP. Figure 1 shows a map of the pretreatment jurisdictional boundaries for the Alliance service area.

This Annual Report, prepared by the District on behalf of the Alliance, summarizes pretreatment program activities during the 2024 calendar year. It is submitted in accordance with Section 4.A.5 of Agreed Order 21502 (Salmon Creek Treatment Plant), Section 4.A.5 of Agreed Order 21503 (Ridgefield Treatment Plant), and Section S6.D of the National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit No. WA0023639 for the Salmon Creek Treatment Plant.

Figure 1 – Discovery Clean Water Alliance Pretreatment Jurisdiction Map



PLANT PERFORMANCE

There were no permit violations for either Salmon Creek Treatment Plant (SCTP) or Ridgefield Treatment Plant (RTP) due to interference or inhibition from industrial sources. Priority pollutant and Whole Effluent Toxicity (WET) analyses did not detect any pollutants passing through the treatment plants at levels that would cause harm to aquatic life in the receiving waters.

PROGRAM OVERVIEW

The Alliance IPP classifies industrial users (IUs) based on the quantity and nature of their wastewater discharge and issues control documents to authorize their discharge in accordance with the Alliance Pretreatment Regulations. The classes of IUs, type and current number of control documents are summarized in Table 1 below.

Table 1 – IU Classification Summary

Class	Criteria	Control Document	No.
SIU	An IU that meets one of the following: • Is subject to the Categorical Pretreatment Standards (40 CFR 405-471); • Discharges an average of 25,000 gpd or more processed wastewater to the POTW (excluding sanitary, non-contact cooling, and boiler blowdown wastewater); • Contributes 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW or • Is designated as such by the Alliance due to reasonable potential for adversely affecting the POTW's operations	Industrial Wastewater Discharge Permit (Permit)	3
MIU	An IU that does not meet the SIU criteria but is identified as having the potential to discharge wastewater that could have an adverse impact on the POTW's operations.	Letter of Discharge (LOD)	3
FOG	An IU that has the potential to introduce wastewater containing fats, oils and grease (FOG) in quantities or concentrations that could cause interference with the POTW's operations.	N/A	421

The three (3) Significant Industrial Users (SIUs) are located in the District collections system service area and flow to SCTP. SIUs are managed through annual facility inspections and sampling, reviewing self-monitoring reports, and enforcement actions as required by the

Pretreatment Regulations and Enforcement Response Plan (ERP). IPP staff prioritize maintaining working relationships and ongoing communication with these users to promote information-sharing and compliance.

Minor Industrial Users (MIUs) are managed through periodic facility inspections and sampling and reviewing self-monitoring reports, as required. IPP staff work with users to understand pretreatment requirements and conduct enforcement actions, when necessary, per the ERP.

The majority of IUs in the Alliance IPP are classified as Fats, Oils and Grease (FOG) Users. Most are food service establishments (FSEs) and other entities that provide commercial food service, or automotive facilities. FOG Users are required to install and maintain grease removal devices (GRDs), which are managed by IPP staff through routine facility inspections and pump-out report reviews.

SUMMARY OF APPENDICES IN REPORT

Appendix A provides a summary of influent, effluent, and biosolids monitoring data for the SCTP, conducted in accordance with NPDES permit, biosolids management, and land application requirements. Metal concentrations remain below inhibition levels, and removal rates were consistent with previous years. Other pollutants monitored were either not detected or present at low levels. Biosolids production and land application data are also provided in this appendix.

Appendix B shows a comparison of the local limits to the Maximum Allowable Headworks Loadings (MAHLs). Influent concentrations and loadings for local limit-regulated pollutants indicate that current limits are protective of water quality, beneficial biosolids reuse, and plant performance.

Appendices C through I summarize program implementation activities, including an updated Industrial User summary, permit issuance and renewal activity, user inspections and monitoring information, program changes and resources.

Appendix J summarizes industrial user compliance and enforcement activities.

PRIORITIES AND ACCOMPLISHMENTS FOR REPORTING YEAR

Public Education and Outreach

The Alliance and the District continue to prioritize pollution prevention education and outreach to encourage proper disposal of non-flushable products and enhance awareness of water quality issues. These efforts included newsletter distribution, the Freeze the Grease program, and online outreach. District staff also participate in several community events throughout the year to interact directly with customers in providing this information.

Interagency Coordination and Training

IPP staff actively participate in several local, regional, and national groups to facilitate

networking and knowledge-sharing in the pretreatment field. This includes membership in the Oregon Association of Clean Water Agencies (ACWA), the National Association of Clean Water Agencies (NACWA), and the Portland Metro area's Preferred Pumper Program (PPP). The District also participates in the Local Interagency Networking Cooperative (LINC) and the American Public Works Association (APWA) PreFOG subcommittee and helps to coordinate the Pacific Northwest Pretreatment Workshop sponsored by Western States Alliance (WSA). IPP staff attend formal training and webinars throughout the year as available.

Program Coordination & Optimization

As the Alliance continues to implement the approved program, IPP staff have been working to improve efficiency within the multijurisdictional framework and to be responsive to continued development in the service area. The District and City of Battle Ground coordinate closely on plan review and user survey processes to ensure non-residential customers are identified and classified appropriately. The Alliance is also implementing a new software program to optimize resources and data management.

Wastewater Surveillance Program Participation

The Alliance continued its participation in the CDC/WEF National Wastewater Surveillance System (NWSS) through partnership with the Washington Department of Health. Through this program, the Alliance provides wastewater samples for analysis of the SARS-CoV-2 virus and other respiratory illnesses to support public health initiatives.

APPENDIX A: SCTP Monitoring Data

Total Metals per EPA 200 series									
1st Quarter 2024									
CAS ID#	Influent Sampled: 2/1/24				Effluent Sampled: 2/1/24				Percent Removal
	Results in mg/L (*except Hg*)								
	Parameter	INF	MRL	Q	*Parameter*	EFF	MRL	Q	
7440-36-0	Antimony	ND	0.00500	R-04	Antimony	ND	0.00100		NA
7440-38-2	Arsenic	ND	0.00500	R-04	Arsenic	0.00148	0.00100		9%
7440-41-7	Beryllium	ND	0.00100	R-04	Beryllium	ND	0.0000200		NA
7440-43-9	Cadmium	ND	0.00100	R-04	Cadmium	ND	0.000200		NA
7440-47-3	Chromium	ND	0.01000	R-04	Chromium	ND	0.00200		NA
7440-50-8	Copper	0.0260	0.01000		Copper	0.0042	0.00200		76%
7439-92-1	Lead	ND	0.00100	R-04	Lead	ND	0.000200		79%
7439-97-6	Mercury (ug/L)	0.01180	0.00050		Mercury (ug/L)	0.00143	0.000500		91%
7439-98-7	Molybdenum	ND	0.00500	R-04	Molybdenum	0.00118	0.00100		29%
7440-02-0	Nickel	ND	0.01000	R-04	Nickel	ND	0.00200		NA
7782-49-2	Selenium	ND	0.00500	R-04	Selenium	ND	0.00100		NA
7440-22-4	Silver	ND	0.00100	R-04	Silver	ND	0.0000200		NA
7440-28-0	Thallium	ND	0.00100	R-04	Thallium	ND	0.0000200		NA
7440-66-6	Zinc	0.07240	0.02000	B-02	Zinc	0.0342	0.00400		53%

Total Metals per EPA 200 series / HG per EPA 1631E									
2nd Quarter 2024									
CAS ID#	Influent Sampled: 5/1/24				Effluent Sampled: 5/1/24				Percent Removal
	Results in mg/L (*except Hg*)								
	Parameter	INF	MRL	Q	*Parameter*	EFF	MRL	Q	
7440-36-0	Antimony	ND	0.00100		Antimony	ND	0.00100		NA
7440-38-2	Arsenic	0.00169	0.00100		Arsenic	0.00140	0.00100		17%
7440-41-7	Beryllium	ND	0.00020		Beryllium	ND	0.00020		NA
7440-43-9	Cadmium	ND	0.00020		Cadmium	ND	0.000200		NA
7440-47-3	Chromium	ND	0.00200		Chromium	ND	0.0020		NA
7440-50-8	Copper	0.0256	0.00200		Copper	0.01120	0.00200		56%
7439-92-1	Lead	0.000428	0.00020		Lead	ND	0.000200		77%
7439-97-6	Mercury (ug/L)	0.0343	0.00050	*	Mercury (ug/L)	0.00124	0.000500	*	96%
7439-98-7	Molybdenum	0.00164	0.00100		Molybdenum	ND	0.00100		70%
7440-02-0	Nickel	ND	0.00400		Nickel	ND	0.00400		NA
7782-49-2	Selenium	ND	0.00100		Selenium	ND	0.00100		NA
7440-22-4	Silver	ND	0.00020		Silver	ND	0.0002000		NA
7440-28-0	Thallium	ND	0.00020		Thallium	ND	0.0002000		NA
7440-66-6	Zinc	0.08610	0.00400		Zinc	0.0295	0.00400		66%

Total Metals per EPA 200 series									
3rd Quarter 2024									
CAS ID#	Influent Sampled: 7/18/24				Effluent Sampled: 7/18/24				Percent Removal
	Results in mg/L (*except Hg*)								
	Parameter	INF	MRL	Q	*Parameter*	EFF	MRL	Q	
7440-36-0	Antimony	ND	0.00100		Antimony	ND	0.00100		NA
7440-38-2	Arsenic	0.00194	0.00100		Arsenic	0.00155	0.00100		20%
7440-41-7	Beryllium	ND	0.000020		Beryllium	ND	0.0002000		NA
7440-43-9	Cadmium	ND	0.000200		Cadmium	ND	0.000200		NA
7440-47-3	Chromium	ND	0.00200		Chromium	ND	0.00200		NA
7440-50-8	Copper	0.0263	0.00200		Copper	0.0132	0.00200		50%
7439-92-1	Lead	0.000560	0.000200		Lead	ND	0.000200		82%
7439-97-6	Mercury (ug/L)	0.02190	0.000500		Mercury (ug/L)	0.00147	0.000500		93%
7439-98-7	Molybdenum	0.00339	0.00100		Molybdenum	0.00171	0.00100		50%
7440-02-0	Nickel	ND	0.0040		Nickel	ND	0.0040		NA
7782-49-2	Selenium	ND	0.00100		Selenium	ND	0.00100		NA
7440-22-4	Silver	ND	0.000200		Silver	ND	0.0002000		NA
7440-28-0	Thallium	ND	0.000200		Thallium	ND	0.0002000		NA
7440-66-6	Zinc	0.228	0.00400	B-02	Zinc	0.1940	0.00400	B-02	15%

Total Metals per EPA 200 series / HG per EPA 1631E									
4th Quarter 2024									
CAS ID#	Influent Sampled: 10/11/24				Effluent Sampled: 10/11/24				Percent Removal
	Results in mg/L (*except Hg*)								
	Parameter	INF	MRL	Q	*Parameter*	EFF	MRL	Q	
7440-36-0	Antimony	ND	0.00100		Antimony	ND	0.00100		NA
7440-38-2	Arsenic	0.00256	0.00100		Arsenic	0.00193	0.00100		25%
7440-41-7	Beryllium	ND	0.000200		Beryllium	ND	0.0002000		NA
7440-43-9	Cadmium	ND	0.000200		Cadmium	ND	0.000200		NA
7440-47-3	Chromium	ND	0.00200		Chromium	ND	0.00200		NA
7440-50-8	Copper	0.0251	0.00200		Copper	0.0219	0.00200		13%
7439-92-1	Lead	0.000525	0.000200		Lead	ND	0.000200		81%
7439-97-6	Mercury (ug/L)	0.01840	0.000500	B	Mercury (ug/L)	0.00111	0.000500		94%
7439-98-7	Molybdenum	0.00177	0.00100		Molybdenum	0.00113	0.00100		36%
7440-02-0	Nickel	0.00322	0.0020		Nickel	ND	0.0020		69%
7782-49-2	Selenium	ND	0.00100		Selenium	ND	0.00100		NA
7440-22-4	Silver	ND	0.000200		Silver	ND	0.0002000		NA
7440-28-0	Thallium	ND	0.000200		Thallium	ND	0.0002000		NA
7440-66-6	Zinc	0.0957	0.00400		Zinc	0.0763	0.00400		20%

< - 1/2 of the reporting limit was used for all non-detectable data in percent removal calculations.

Qualifiers:

B: Analyte detected in an associated blank at a level above the MRL

B-02: Analyte detected in an associated blank at a level between one-half the MRL and the MRL.

R-04: Reporting levels elevated due to preparation and/or analytical dilution necessary for analysis

Notes: * Grab sample 4/24/24

Salmon Creek Treatment Plant (WA0023639) Priority Pollutant Monitoring					
PARAMETER	**UNITS**	**INFLUENT**	**EFFLUENT**	**PERCENT REMOVAL**	**BIOSOLIDS (MG/KG)**
Volatile Organic Compounds (EPA 624/5035/8260C)		5/1/2024	5/1/2024		5/29/2024
ACROLEIN	µg/l	<10.00	<10.00	NA	<3.0
ACRYLONITRILE	µg/l	<2.00	<2.00	NA	<0.610
BENZENE	µg/l	<0.200	<0.200	NA	<0.150
BROMOFORM	µg/l	<1.00	<1.00	NA	<0.150
CARBON TETRACHLORIDE	µg/l	<1.00	<1.00	NA	<0.150
CHLOROBENZENE	µg/l	<0.500	<0.500	NA	<0.150
CHLORODIBROMOMETHANE	µg/l	<1.00	<1.00	NA	<0.150
CHLOROETHANE	µg/l	<2.00	<2.00	NA	<0.150
2-CHLOROETHYLVINYL ETHER	µg/l	<10.0	<10.0	NA	<0.300
CHLOROFORM	µg/l	<1.00	<1.00	NA	<0.150
DICHLOROBROMOMETHANE	µg/l	<1.00	<1.00	NA	<0.150
1,1-DICHLOROETHANE	µg/l	<0.400	<0.400	NA	<0.150
1,2-DICHLOROETHANE	µg/l	<0.400	<0.400	NA	<0.150
1,1-DICHLOROETHYLENE	µg/l	<0.400	<0.400	NA	<0.150
1,2-DICHLOROPROPANE	µg/l	<0.500	<0.500	NA	<0.150
1,3-DICHLOROPROPYLENE	µg/l	<1.00	<1.00	NA	<0.150
ETHYLBENZENE	µg/l	<0.500	<0.500	NA	<0.150
METHYL BROMIDE	µg/l	<5.00	<5.00	NA	<0.300
METHYL CHLORIDE	µg/l	<5.00	<5.00	NA	<0.150
METHYLENE CHLORIDE	µg/l	<10.0	<10.0	NA	<0.300
1,1,2,2-TETRACHLOROETHANE	µg/l	<0.500	<0.500	NA	<0.150
TETRACHLOROETHYLENE	µg/l	<0.400	<0.400	NA	<0.150
TOLUENE	µg/l	1.91	<1.00	74%	<0.150
1,2-TRANS-DICHLORETHYLENE	µg/l	<0.400	<0.400	NA	<0.150
1,1,1-TRICHLOROETHANE	µg/l	<0.400	<0.400	NA	<0.150
1,1,2-TRICHLOROETHANE	µg/l	<0.500	<0.500	NA	<0.150
TRICHLORETHYLENE	µg/l	<0.400	<0.400	NA	<0.150
VINYL CHLORIDE	µg/l	<0.200	<0.200	NA	<0.150
Tentatively Identified Compounds (TICs)					
Dimethyl sulfide	µg/l	4.8	<5.0		
D-Limonene	µg/l	2.1	<5.0		
Isopropyl Alcohol	µg/l	4.9	<5.0		
Methanethiol	µg/l	2.0	<5.0		
Disulfide, dimethyl	µg/l	1.7	<5.0		
Pesticides/PCBs (EPA 608.3)					
ALDRIN	µg/l	<0.0583	<0.0577	NA	<0.012
ALPHA-BHC	µg/l	<0.0583	<0.0577	NA	<0.0062
BETA-BHC	µg/l	<0.0583	<0.0577	NA	<0.0062
GAMMA-BHC	µg/l	<0.0583	<0.0577	NA	<0.014
DELTA-BHC	µg/l	<0.0583	<0.0577	NA	<0.0062
CHLORDANE	µg/l	<0.728	<0.721	NA	<0.0062
4,4-DDT	µg/l	<0.0583	<0.0577	NA	<0.012
4,4-DDE	µg/l	<0.0583	<0.0577	NA	<0.0062
4,4-DDD	µg/l	<0.0583	<0.0577	NA	<0.012
DIELDRIN	µg/l	<0.0583	<0.0577	NA	<0.0075
ALPHA-ENDOSULFAN	µg/l	<0.0583	<0.0577	NA	<0.0062
BETA-ENDOSULFAN	µg/l	<0.0583	<0.0577	NA	<0.012
ENDOSULFAN SULFATE	µg/l	<0.0583	<0.0577	NA	<0.012
ENDRIN	µg/l	<0.0583	<0.0577	NA	<0.0062
ENDRIN ALDEHYDE	µg/l	<0.0583	<0.0577	NA	<0.012
HEPTACHLOR	µg/l	<0.0583	<0.0577	NA	<0.0062
HEPTACHLOR EPOXIDE	µg/l	<0.0583	<0.0577	NA	<0.012
PCB-1242	µg/l	<0.103	<0.0971	NA	<0.032
PCB-1254	µg/l	<0.103	<0.0971	NA	<0.120
PCB-1221	µg/l	<0.103	<0.0971	NA	<0.032
PCB-1232	µg/l	<0.103	<0.0971	NA	<0.032
PCB-1248	µg/l	<0.103	<0.0971	NA	<0.032
PCB-1260	µg/l	<0.103	<0.0971	NA	<0.080
PCB-1016	µg/l	<0.103	<0.0971	NA	<0.032
TOXAPHENE	µg/l	<1.94	<1.92	NA	<0.620

Salmon Creek Treatment Plant (WA0023639) Priority Pollutant Monitoring					
PARAMETER	UNITS	INFLUENT	EFFLUENT	PERCENT REMOVAL	BIOSOLIDS (MG/KG)
Semivolatile Organic Compounds (EPA 625.1)		5/1/2024	5/1/2024		5/29/2024
2-CHLOROPHENOL	µg/l	<2.04	<0.190	NA	<130
2,4-DICHLOROPHENOL	µg/l	<2.04	<0.190	NA	<130
2,4-DIMETHYLPHENOL	µg/l	<10.2	<0.952	NA	<130
4,6-DINITRO-O-CRESOL	µg/l	<10.2	<0.952	NA	<760
2,4-DINITROPHENOL	µg/l	<10.2	<0.952	NA	<760
2-NITROPHENOL	µg/l	<4.08	<0.381	NA	<130
4-NITROPHENOL	µg/l	<8.16	<0.381	NA	<760
P-CHLORO-M-CRESOL	µg/l	<4.08	<0.762	NA	<130
PENTACHLOROPHENOL	µg/l	<4.08	<0.381	NA	<760
PHENOL	µg/l	12.7 (J)	<0.762	98%	<130
2,4,6-TRICHLOROPHENOL	µg/l	<2.04	<0.190	NA	<130
ACENAPHTHENE	µg/l	<0.408	<0.0381	NA	<130
ACENAPHTHYLENE	µg/l	<0.408	<0.0381	NA	<130
ANTHRACENE	µg/l	<0.408	<0.0381	NA	<130
BENZIDINE	µg/l	<20.4(Q-52)	<1.90(Q-52)	NA	<760
BENZO(A)ANTHRACENE	µg/l	<0.408	<0.0381	NA	<130
BENZO(A)PYRENE	µg/l	<0.612	<0.0571	NA	<130
3,4 BENZO-FLUORANTHENE	µg/l	<0.612	<0.0571	NA	<130
BENZO(K)FLUORANTHENE	µg/l	<0.612	<0.0571	NA	<130
BENZO(GHI)PERYLENE	µg/l	<0.408	<0.0381	NA	<130
BIS (2-CHLOROETHOXY) METHANE	µg/l	<1.02	<0.0952	NA	<130
BIS (2-CHLOROETHYL)-ETHER	µg/l	<1.02	<0.0952	NA	<130
BIS (2-CHLOROISO-PROPYL) ETHER	µg/l	<1.02	<0.0952	NA	<130
BIS (2-ETHYLHEXYL) PHTHALATE	µg/l	<8.16	<0.762	NA	<130
BIS (2-ETHYLHEXYL) PHTHALATE*	µg/l	<8.16	0.86	79%	NA
BIS (2-ETHYLHEXYL) PHTHALATE**	µg/l	<8.00	0.37	95%	NA
BIS (2-ETHYLHEXYL) PHTHALATE***	ug/l	<20.0 (R-04)	0.233	99%	NA
4-BROMOPHENYL PHENYL ETHER	µg/l	<1.02	<0.0952	NA	<130
BUTYL BENZYL PHTHALATE	µg/l	<8.16	<0.762	NA	<130
2-CHLORONAPHTHALENE	µg/l	<0.408 (Q-30)	<0.0762(Q-30)	NA	<130
4-CHLORPHENYL PHENYL ETHER	µg/l	<1.02	<0.0952	NA	<130
CHRYSENE	µg/l	<0.408	<0.0381	NA	<130
DIBENZO(A,H) ANTHRACENE	µg/l	<0.408	<0.0381	NA	<130
1,2-DICHLOROBENZENE	µg/l	<0.500	<0.500	NA	<130
1,3-DICHLOROBENZENE	µg/l	<0.500	<0.500	NA	<130
1,4-DICHLOROBENZENE	µg/l	<0.500	<0.500	NA	<130
3,3-DICHLOROBENZIDINE	µg/l	<20.4(Q-52)	<1.90(Q-52)	NA	<130
DIETHYL PHTHALATE	µg/l	<8.16	<0.762	NA	<130
DIMETHYL PHTHALATE	µg/l	<8.16	<0.762	NA	<130
2,4-DINITROTOLUENE	µg/l	<0.408	<0.381	NA	<130
2,6-DINITROTOLUENE	µg/l	<0.408	<0.762	NA	<130
DI-N-OCTYL PHTHALATE	µg/l	<8.16	<0.762	NA	<130
DI-N-BUTYL PHTHALATE	µg/l	<8.16	<0.762	NA	<130
1,2-DIPHENYLHYDRAZINE	µg/l	<1.02	<0.190	NA	<130
FLUORANTHENE	µg/l	<0.408	<0.0381	NA	<130
FLUORENE	µg/l	<0.408	<0.0381	NA	<130

Qualifiers:

J: Estimated Result. Result detected below lowest point of calibration curve, but above specified MDL.

Q-30: Recovery for Lab Control Spike (LCS) is below the lower control limit. Data may be biased low.

Q-52: Due to known erratic recoveries, the result and reporting levels for this analyte are reported as Estimated Values. This analyte may not have passed all QC requirements for this method.

R-04: Reporting levels elevated due to dilution required for analysis.

Notes: * additional sample collected for Bis(2-ethylhexyl)phthalate only, 2/1/24

** additional sample collected for Bis(2-ethylhexyl)phthalate only, 7/18/24

*** additional sample collected for Bis(2-ethylhexyl)phthalate only, 10/11/24

NT = not tested

Salmon Creek Treatment Plant (WA0023639) Priority Pollutant Monitoring					
PARAMETER	**UNITS**	**INFLUENT**	**EFFLUENT**	**PERCENT REMOVAL**	**BIOSOLIDS (MG/KG)**
HEXACHLOROBENZENE	µg/l	<0.408	<0.0381	NA	<130
HEXACHLOROBUTADIENE	µg/l	<1.02	<0.0952	NA	<130
HEXACHLOROCYCLOPENTADIENE	µg/l	<2.04	<0.190	NA	<130
HEXACHLOROETHANE	µg/l	<1.02 (Q-30)	<0.0952 (Q-30)	NA	<130
INDENO(1,2,3-CD) PYRENE	µg/l	<0.408	<0.0381	NA	<130
ISOPHORONE	µg/l	<1.02	<0.0952	NA	<130
NAPHTHALENE	µg/l	<0.816	<0.0762	NA	<130
NITROBENZENE	µg/l	<4.08	<0.381	NA	<130
N-NITROSODI-N-METHYLAMINE	µg/l	<1.02	<0.0952	NA	<760
N-NITROSODI-N-PROPYLAMINE	µg/l	<5.31	<0.0952	NA	<130
N-NITROSODI-N-PHENYLAMINE	µg/l	<1.02	<0.0952	NA	<130
PHENANTHRENE	µg/l	<0.408	<0.0381	NA	<130
PYRENE	µg/l	<0.408	<0.0381	NA	<130
1,2,4-TRICHLOROBENZENE	µg/l	<1.02 (Q-30)	<0.0952 (Q-30)	NA	<130
Tentatively Identified Compounds (TICs)					
.gamma.-Sitosterol	µg/l	42	ND		
1,4-Benzenedicarboxylic acid, bis(	µg/l	68	ND		
3,4-Octadiene, 7-methyl-	µg/l	23	ND		
Benzeneacetic acid	µg/l	23	ND		
Caffeine	µg/l	38	ND		
Cholestanol	µg/l	130	ND		
Cholesterol	µg/l	88	0.82		
Cyclododecane	µg/l	20	ND		
Diethylene glycol monododecyl ethe	µg/l	19	ND		
dl-.alpha.-Tocopherol	µg/l	33	ND		
Dodecanoic acid	µg/l	53	ND		
Ethanol, 2-phenoxy-	µg/l	24	ND		
n-Decanoic acid	µg/l	21	ND		
n-Heptadecanol-1	µg/l	48	ND		
n-Hexadecanoic acid	µg/l	300	1.9		
n-Nonadecanol-1	µg/l	55	ND		
Oleic Acid	µg/l	520	ND		
Palmitoleic acid	µg/l	25	ND		
Squalene	µg/l	130	ND		
Tetradecanoic acid	µg/l	63	ND		
1,4-Benzenedicarboxylic acid, bis(	µg/l	ND	4.1		
3,5-di-tert-Butyl-4-hydroxyphenylp	µg/l	ND	0.86		
Acetophenone	µg/l	ND	0.79		
Cyclopenta[g]-2-benzopyran, 1,3,4,	µg/l	ND	1.4		
Docosane, 11-butyl-	µg/l	ND	1.1		
Eicosane	µg/l	ND	1.6		
Eicosane, 10-Methyl	µg/l	ND	1.6		
Ethanol, 2-butoxy-, phosphate (3:1	µg/l	ND	3.5		
Heptadecane, 2,6,10,15-tetramethyl	µg/l	ND	0.90		
Heptadecane, 9-octyl-	µg/l	ND	1.6		
Hexacosane	µg/l	ND	1.8		
Hexadecane	µg/l	ND	1.6		
Octadecanoic acid	µg/l	ND	1.4		
Tetracosane	µg/l	ND	0.87		

Salmon Creek Treatment Plant (WA0023639) Priority Pollutant Monitoring					
PARAMETER	UNITS	INFLUENT	EFFLUENT	PERCENT REMOVAL	BIOSOLIDS (mg/kg)
PERMIT-SPECIFIED PARAMETERS		5/1/2024	5/1/2024		5/29/2024
PHENOLICS, TOTAL	MG/L	0.091	0.017 (J)	NA	21.7
CYANIDE	MG/L	0.0155	0.00553	84%	<1.30
OIL & GREASE (Total) *	MG/L	21.3	<4.76	89%	NT
PHOSPHORUS	MG/L	3.62	1.85	49%	26300
SULFATE	MG/L	17.3	20.7	NA	9110
SULFIDE	MG/L	.046 (J)	<0.05	NA	NT
CHLORIDE	MG/L	48.3	48.7	NA	387 **
FLUORIDE	MG/L	<1.00	<1.00	NA	<32
BORON	MG/L	0.173	0.171	NA	30.0
NITRATE	MG/L	<0.0200	16.40	NA	<16
TOTAL INORGANIC NITROGEN	MG/L	41.1	4.43	89%	74700
ACETONE	**µg/l**	128	<20.0	92%	1600*
STYRENE	**µg/l**	<1.00	<1.00	NA	<0.150
IRON	MG/L	0.287	0.0701	91%	6030
HARDNESS	MG/L	106	124	-17%	NA
SALINITY	G/KG	<2.0	0.3 (J)	NA	NA
TOTAL DISSOLVED SOLIDS	MG/L	341	366	NA	NA

Notes: * Grab Sample 4/24/24
** Result is an estimate due to QC failure
NT = not tested

Salmon Creek Wastewater Treatment Plant Biosolids Testing Results 2024									
Total Metals Units:mg/Kg (ppm), dry wt.									
Analyte	Analysis Method	Threshold	Event 1 5-Feb	Event 2 12-Mar	Event 3 29-May	Event 4 16-Jul	Event 5 17-Sep	Event 6 14-Nov	Annual Average
Arsenic (As)	6020A	41	5.5	5.1	5.2	5.8	6.1	5.8	5.6
Cadmium (Cd)	6020A	39	0.95	0.91	0.93	1.11	0.98	1.01	0.98
Chromium (Cr)	6020A	1200	18.3	21.2	18.5	19.6	17.9	17.6	18.9
Copper (Cu)	6020A	1500	252	236	233	280	277	261	257
Lead (Pb)	6020A	300	6.17	6.08	6.41	6.18	6.56	6.68	6.35
Mercury (Hg)	7471B	17	0.32	0.27	0.59	0.49	0.36	0.24	0.38
Molybdenum (Mo)	6020A	75	16	25.5	22.3	18.8	30.7	27.5	23.5
Nickel (Ni)	6020A	420	16.1	17.2	15.0	15.9	24.5	17.8	17.8
Selenium (Se)	6020A	36	7.3	7.1	7	8.2	7.7	8	7.5
Zinc (Zn)	6020A	2800	891	829	830	1040	1080	954	937
Silver (Ag)	6020A		1.97	1.78	1.93	1.84	3.07	2.36	2.16
Beryllium (Be)	6020A		<0.12	<0.14	<0.12	<0.14	<0.10	<0.13	ND
Antimony (Sb)	6020A		1.92	1.96	2.07	3.97	2.17	3.42	2.59
Thallium (Tl)	6020A		<0.12	<0.14	<0.12	<0.14	<0.10	<0.13	ND
*Chromium VI (Cr 6)	SW7196A		<14.9	*72.8	**NT	**NT	**NT	**NT	ND
Biosolids Nutrient Analysis Units: mg/kg dry									
Analyte	EPA Method								Average
Ammonia-Nitrogen	SM4500-NH3G		14,100	15,800	16,400	13,200	13,400	14,400	14,550
Total Kjeldahl Nitrogen	351.4		71,000	66,600	74,700	66,700	91,900	79,200	75,017
Total Solids %	SM2540G		13.70	13.4	15.5	13.7	12.8	12.6	13.62
Total Volatile Solids (mg/kg)	SM2540G		71.5	60.9	64.9	80.5	75.5	66	69.9
Phosphorus	SM4500-PB+E		28,600	24,900	26,300	23,700	23,400	21,600	24,750
Nitrate-Nitrogen	353.2M/353.2M		<2.5	<18	<16	<36	<19	<7.9	ND
Nitrite-Nitrogen	353.2M		<18	<18	<16	<36	<19	<7.9	ND
pH	9045D		8.32	7.92	8.20	8.22	7.9	8.04	N/A

** NT = Not Tested

2024 ANNUAL
BIOSOLIDS (SLUDGE) PRODUCTION REPORT

	Cubic Yards	Dry Pounds	Wet Pounds
January	1,331	313,948	2,290,019
February	1,209	284,292	2,079,028
March	1,278	303,886	2,197,353
April	1,170	301,007	2,012,787
May	1,235	297,668	2,123,943
June	1,319	313,484	2,269,437
July	1,282	303,848	2,204,543
August	1,350	303,909	2,321,200
September	1,384	312,907	2,379,959
October	1,345	297,544	2,312,770
November	1,477	326,669	2,540,178
December	1,365	309,097	2,347,875
Total	15,743.43	3,668,259	27,079,092
Tons Processed		1,834	13,540
Metric Tons		1,664	12,283

DRY TON BALANCE:	
From Ridgefield	0.400
Processed (no RF)	1833.73
Total Processed	1834.13
To Long (NSF)	815.05
To Local (M&J)	162.00
To Local (FMF)	409.19
Total Applied	1386.24
Est. Recycled Dry Tons	**447.89**

Monthly Dry Tons Hauled			
	NSF	M&J	Fire MTN
January	85.42		
February	164.32		
March	116.04		
April	115.41		
May	63.27		
June			57.7
July			
August		162	180.48
September			102.16
October	66.12		68.85
November	83.05		
December	121.42		
Total	815.05	162	409.19

Current Avg. TS (Annual Summary) =	**13.51**
Estimated Ave. Capture Rate %	76.7

Visual Levels of Biosolids Storage Bays (2024)
(estimates taken at end of each month)

	Visual CY Bay 1	Visual CY Bay 2	Visual CY Bay 3	Visual CY Bay 4	Total est. CY (94.1/log)	Estimate WT (x 0.86)	Dry Tons Hauled	Estimated Bay DT (at avg TS%)
Previous Year Carryover >					94	80.84		44.7
JAN	94	0	0	0	94	81	85	11
FEB	94	282	0	0	376	323	164	44
MAR	94	0	0	0	94	81	116	11
APR	0	0	0	0	0	0	115	0
MAY	0	0	0	0	0	0	63	0
JUN	0	0	0	0	0	0	58	0
JUL	0	0	1,412	0	1,412	1,214	0	164
AUG	941	0	1,224	377	2,542	2,186	342	295
SEP	94	0	0	0	94	81	102	11
OCT	188	0	0	0	188	162	135	22
NOV	94	0	0	0	94	81	83	11
DEC	565	0	0	0	565	486	121	65.6

Assumptions:
94.1 CY per foot = each section (188.27 CY/entire stop log height)
0.86 x cubic yards = wet tons

TOTAL DRY TONS PRODUCED IN 2024 = 1,407.19

APPENDIX B: Local Limits Evaluation

Parameter	Avg Inf Conc (mg/L)	Actual Loading (lbs/day)	MAHL* (lbs/day)	Safety Factor
Arsenic	0.00155	0.121	2.86	24
Cadmium	<0.0002	<0.078	0.79	>10
Chromium	<0.0002	<0.784	4.01	>5
Copper	0.02575	2.018	39.3	19
Lead	0.00113	0.088	3.99	45
Mercury (ug/L)	0.04980	0.0039	0.1582	41
Molybdenum	0.00545	0.427	1.07	3
Nickel	0.00081	0.063	10.66	169
Selenium	<0.005	<0.392	0.83	>2
Silver	<0.0002	<0.016	4.2	>268
Zinc	0.12055	9.449	21.2	2
Cyanide	0.0155	1.215	5.2	4

2024 Average Influent Flow (MGD): 9.40

*Discovery Clean Water Alliance Local Limits Evaluation Report, March 2022

APPENDIX C: Industrial User Survey Update

Classification	IU Name	Category	SIC Code	Permit No.	Service Area	WWTP	Max Flow (GPD)
SIU/CIU	ProTech Industries, Inc.	433.17	3329	2023-03	District	SCTP	750
SIU/CIU	nLight Photonics Corp.	469	3674	2023-01	District	SCTP	10,000
SIU/CIU	IMAT, Inc.	469	3674	2023-02	District	SCTP	1,500
MIU	Waste Connections	N/A	4953	LOD 2023-02	District	SCTP	1,000
MIU	Oldcastle	N/A	3251/5231	LOD 2023-01	Battle Ground	SCTP	16,000
MIU	Andersen Dairy	N/A	5451	LOD 2023-03	Battle Ground	SCTP	2,000

Abbreviations Key:

SIU	Significant Industrial User
CIU	Categorical Industrial User
MIU	Minor Industrial User
SCTP	Salmon Creek Treatment Plant
RTP	Ridgefield Treatment Plant

APPENDIX D: Permit Activity

NEW/RENEWED INDUSTRIAL WASTEWATER DISCHARGE PERMITS

None

PERMIT MODIFICATIONS

None

LETTER OF DISCHARGE ISSUED

None

LETTER OF ZERO DISCHARGE ISSUED

None

LETTER OF AUTHORIZATION ISSUED

None

SPECIAL WASTEWATER DISCHARGE AUTHORIZATIONS ISSUED

None

TERMINATED INDUSTRIAL WASTEWATER DISCHARGE PERMITS

None

IN PROCESS MODIFICATIONS, RENEWALS, & NEW INDUSTRIAL WASTEWATER DISCHARGE PERMITS

None

IN PROCESS MODIFICATIONS, RENEWALS, & NEW WASTEWATER DISCHARGE AUTHORIZATIONS

LOD 2025-XX	ICD Coatings
LOD 2025-XX	City of Vancouver WS 14

APPENDIX E: Industrial User Compliance Summary

Business Name: nLight Corporation
Address: 5408 NE 88th St., Bldg. E, Vancouver WA 98665

Last Inspection: 6/10/2024	**Next Inspection:** 2025 - Annual

Permit Information			**Self-Monitoring Reports**						Non-Compliance		Enforce	SNC?
2023-01		**SIU/CIU**	Date Due	Received	Date Due	Received	Date Due	Received	Date	Type	Action	
SIC/CIU:	3674	469	2/15/2024	2/12/2024	6/15/2024	6/5/2024	10/15/2024	10/4/2024	Aug-24	Eff lim	No	No
EFF:	7/1/2023		3/15/2024	3/8/2024	7/15/2024	7/1/2024	11/15/2024	11/1/2024				
EXP:	6/30/2028		4/15/2024	4/2/2024	8/15/2024	8/2/2024	12/15/2024	12/4/2024				
WWTP:	Salmon Creek		5/15/2024	5/3/2024	9/15/2024	9/4/2024	1/15/2025	1/2/2025				

Parameter Name	**Mon Location**	**Sample Freq**	**Rpt Freq**	**Limits** Daily Max	Mth Avg	Inst Max	**Units**	**Self** Jan-24	**Self** Feb-24	**Self** Mar-24	**Self** Apr-24	**Self** May-24	**Self** Jun-24	**Self** Jul-24	**Self** Aug-24	**Self** Sep-24	**Self** Oct-24	**Self** Nov-24	**Self** Dec-24	**Alliance** Oct-24
Flow, Avg Mon	OF 001	C	M		8000		gpd	1542	1757	2094	1923	1678	1943	2096	2364	4134	2082	2350	2412	NT
Flow, Daily Max	OF 001	C	M	10000			gpd	2804	2664	3208	2859	2478	2770	3246	3662	2040	3119	4295	3414	NT
pH	OF 001	C	M	5.5-10.0			SU	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	NT
Arsenic	OF 001	M	M	0.53			mg/L	0.0126	0.0065	0.00455	0.0042	0.0038	0.00532	0.00515	0.00269	0.0070	0.00625	0.00677	0.00621	0.00564
Fluoride	OF 001	M	M	32	17.4		mg/L	0.349	0.468	0.523	0.499	0.532	0.442	0.324	0.299	0.473	0.502	0.438	0.309	0.834
TTO	OF 001	A	A	1.37			mg/L	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	ND
Fluoride	OF 002	M	M	32	17.4		mg/L	NT	NT	NT	NT	NT	NT	1.3	NT	NT	NT	NT	NT	NT
Arsenic	OF 003	M	M	2.09	0.83		mg/L	0.0348	0.251	0.0548	0.0531	0.0416	0.0308	0.0219	1.3	0.0061	0.0121	0.0149	0.0766	0.107
TSS	OF 004	M	M	61	23		mg/L	3.1	ND	0.7	ND	ND	0.8	0.6	ND	ND	0.5	ND	ND	2.5

Sampling Frequency: C/Continuous, D/Daily, W/Weekly, M/Monthly, Q/Quarterly, S/Semi-Annually, A/Annually, B/Batch
ND = Non Detect, NT = Not Tested, CERT = Certified
Metals reported as Total unless otherwise noted

Business Name: IMAT
Address: 12516 NE 95th St, Suite D110, Vancouver WA 98682

Last Inspection: 9/9/2024	**Next Inspection:** 2025 - Annual

Permit Information			**Self-Monitoring Reports**				Non-Compliance		Enforce	SNC?
2023-02		**SIU/CIU**	Date Due	Received	Date Due	Received	Date	Type	Action	
SIC/CIU:	3674	469	4/15/2024	4/2/2024						
EFF:	11/1/2023		7/15/2024	7/15/2024						
EXP:	10/31/2028		10/15/2024	10/9/2024						
WWTP:	Salmon Creek		1/15/2025	1/6/2025						

Parameter Name	**Mon Location**	**Sample Freq**	**Rpt Freq**	**Limits** Daily Max	Mth Avg	Inst Max	**Units**	**Self** Jan-24	**Self** Feb-24	**Self** Mar-24	**Self** Apr-24	**Self** May-24	**Self** Jun-24	**Self** Jul-24	**Self** Aug-24	**Self** Sep-24	**Self** Oct-24	**Self** Nov-24	**Self** Dec-24	**Alliance** Oct-24
Flow, Avg Mon	OF 001	C	Q	1500			gpd	62.52	240.62	140.58	174.43	168.32	98.97	195.27	101.74	135.7	148.39	149.97	96.29	NT
Flow, Daily Max	OF 001	C	Q	R			gpd	422	1375	727	728	838	432	344	434	640	714	873	437	NT
pH	OF 001	C	Q	6.0-9.0			SU	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	8
Fluoride	OF 001	M	Q	32	17.4		mg/L	0.36	0.66	0.44	0.73	1.2	1.3	0.7	0.75	0.96	0.99	0.86	0.52	1.12
TTO	OF 001	A	A	1.37			mg/L	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	ND

Sampling Frequency: C/Continuous, D/Daily, W/Weekly, M/Monthly, Q/Quarterly, S/Semi-Annually, A/Annually, B/Batch
ND = Non Detect, NT = Not Tested, CERT = Certified; COMP/Compliant; NCOMP/Non-Compliant
Metals reported as Total unless otherwise noted

Business Name: ProTech Industries, Inc.
Address: 14113 NE 3rd Ct, Vancouver WA 98685

Last Inspection: 7/30/2024 | **Next Inspection:** 2025 - Annual

Permit Information			Self-Monitoring Reports			Non-Compliance			SNC?
2023-03		SIU/CIU	Date Due	Received	Date Due Received	Date	Type	Enforce Action	
SIC/CIU:	3329	433.17	4/15/2024	4/2/2024		24-Sep	BOD	No	No
EFF:	11/1/2023		7/15/2024	7/12/2024		24-Dec	BOD	No	No
EXP:	10/31/2028		10/15/2024	10/4/2024					
WWTP:	Salmon Creek		1/15/2025	1/8/2025					

Parameter Name	Mon Location	Sample Freq	Rpt Freq	Limits Daily Max	Limits Mth Avg	Limits Inst Max	Units	Self Jan-24	Self Feb-24	Self Mar-24	Self Apr-24	Self May-24	Self Jun-24	Self Jul-24	Self Aug-24	Self Sep-24	Self Oct-24	Self Nov-24	Self Dec-24	Alliance Oct-24
Flow, Avg Mon	OF 001	C	Q		reported		gpd	271	303	291	291	259	277	283	252	228	266	280	295	NT
Flow, Daily Max	OF 001	C	Q	750			gpd			COMP	COMP					COMP			COMP	NT
pH	OF 001	B	Q	6.0 - 9.0			SU			COMP	COMP					COMP			COMP	COMP
TSS	OF 001	Q	Q	300			mg/L			223	98.1					213			147	120
BOD	OF 001	Q	Q	1000			mg/L			727	1000					2050			1160	809
Arsenic	OF 001	Q	Q	0.53			mg/L			0.00937	0.007					<0.01			0.00701	0.00888
Cadmium	OF 001	Q	Q	0.11	0.07		mg/L			0.000385	<0.0002					<0.002			ND	ND
Chromium	OF 001	Q	Q	2.77	1.71		mg/L			0.0523	0.0404					0.093			0.0296	0.0283
Copper	OF 001	Q	Q	3.38	2.07		mg/L			0.111	0.0586					0.186			0.0832	0.0852
Cyanide	OF 001	Q	Q	0.89	0.65		mg/L			0.0116	<0.0500					<0.050			0.0131	0.00978
Lead	OF 001	Q	Q	0.69	0.43		mg/L			0.00285	0.0011					0.00779			0.00181	0.0041
Mercury	OF 001	Q	Q	0.09			mg/L			ND	0.0019					0.00000688			0.00175	ND
Molybdenum	OF 001	Q	Q	0.57			mg/L			0.00565	0.0086					0.0112			0.0036	0.00553
Nickel	OF 001	Q	Q	3.77	2.38		mg/L			0.04	0.0393					0.0507			0.0174	0.0468
Selenium	OF 001	Q	Q	0.68			mg/L			ND	<.00100					<.01			ND	ND
Silver	OF 001	Q	Q	0.43	0.24		mg/L			ND	.000200					<.002			ND	ND
Zinc	OF 001	Q	Q	2.61	1.48		mg/L			0.947	0.492					1.35			0.776	0.592
TTO	OF 001	A	A	2.13			mg/L			CERT	CERT					CERT			CERT	ND
O&G, Nonpolar	OF 001	Q	Q	50			mg/L			30.8	10.2					18.2			ND	ND
Phenols, Total	OF 001	Q	Q	0.6			mg/L			0.046	0.024					0.045			0.034	0.031

Sampling Frequency: C/Continuous, D/Daily, W/Weekly, M/Monthly, Q/Quarterly, S/Semi-Annually, A/Annually, B/Batch
ND = Non Detect, NT = Not Tested, CERT = Certified; COMP/Compliant; NCOMP/Non-Compliant
Metals reported as Total unless otherwise noted

Business Name: Oldcastle Building Envelope
Address: 1611 SE Commerce Ave, Battle Ground WA 98604

Permit Information		**Self-Monitoring Reports**						Non-Compliance		Enforce	SNC?
2023-01	**MIU**	Date Due	Received	Date Due	Received	Date Due	Received	Date	Type	Action	
SIC/CIU:	4212	2/15/2024	2/8/2024	6/15/2024	6/3/2024	10/15/2024	10/1/2024	multi*	email	No	No
EFF:	4/18/2023	3/15/2024	3/1/2024	7/15/2024	7/1/2024	11/15/2024	11/1/2024				
EXP:	N/A	4/15/2024	4/1/2024	8/15/2024	8/2/2024	12/15/2024	12/2/2024				
WWTP:	Salmon Creek	5/15/2024	5/6/2024	9/15/2024	9/3/2024	1/15/2025	1/4/2025				

Parameter Name	**Mon Location**	**Sample Freq**	**Rpt Freq**	**Limits** Daily Max	Mth Avg	Inst Max	**Units**	**Self** Jan-24	**Self** Feb-24	**Self** Mar-24	**Self** Apr-24	**Self** May-24	**Self** Jun-24	**Self** Jul-24	**Self** Aug-24	**Self** Sep-24	**Self** Oct-24	**Self** Nov-24	**Self** Dec-24	**Alliance** Oct-24
Flow, Daily Max	MMH	C	M	16000			gpd	9854	22044	19848	CD	12973	30970	41246	14144	12707	11796	13057	12127	NT
pH	MMH	M	M		5.5-10.0		SU	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	NT
TSS	MMH	M	M	375			mg/L	13	<5	21	36	190	28	5.8	<5	<5	<5	<5	<5	NT
Copper	MMH	M	M	3.59			mg/L	0.043	0.2	0.043	0.079	0.05	0.17	0.13	0.44	0.31	0.25	0.07	0.61	NT
Silver	MMH	M	M	0.68			mg/L	<0.00025	<0.00025	<0.00025	<0.00025	<0.00025	<0.00025	<0.00025	<0.00025	<0.00025	<0.00025	<0.00025	<0.00025	NT

Sampling Frequency: C/Continuous, D/Daily, W/Weekly, M/Monthly, Q/Quarterly, S/Semi-Annually, A/Annually, B/Batch
ND = Non Detect, NT = Not Tested, CERT = Certified; COMP/Compliant; NCOMP/Non-Compliant
Metals reported as Total unless otherwise noted
CALC = estimated average daily process flows, calculated from water use data
CD = Corrrupted Data. Flow monitoring malfunction, lost data for month of April.

*Flow above Max Daily Limit on multiple days due to ongoing valve issue. Valve locks installed per 8/2/24 email from IU and confirmed by inspection on 10/30/24. Discharge was potable water (not process wastewater).

Business Name: Vancouver Hauling Company (Waste Connections)
Address: 9411 NE 94th Ave, Vancouver WA 98662

Permit Information		**Self-Monitoring Reports**			Non-Compliance		Enforce	SNC?
2023-02	**MIU**	Date Due	Received	Date Due Received	Date	Type	Action	
SIC/CIU:	4212	4/15/2024	4/15/2024					
EFF:	4/28/2023	7/15/2024	7/15/2024					
EXP:	N/A	10/15/2024	10/16/2024					
WWTP:	Salmon Creek	1/15/2025	1/15/2025					

Parameter Name	**Mon Location**	**Sample Freq**	**Rpt Freq**	**Limits** Daily Max	Mth Avg	Inst Max	**Units**	**Self** Jan-24	**Self** Feb-24	**Self** Mar-24	**Self** Apr-24	**Self** May-24	**Self** Jun-24	**Self** Jul-24	**Self** Aug-24	**Self** Sep-24	**Self** Oct-24	**Self** Nov-24	**Self** Dec-24	**Alliance** Oct-24
Flow, Daily Max	MMH	CALC	Q	R			gpd	459			506				599		2275			NT
pH	MMH	Q	Q	5.5-10.0			SU	7.41			8.75				7.62		6.97			NT
TSS	MMH	Q	Q	R			mg/L	390			270				111		309			NT
BOD	MMH	Q	Q	R			mg/L	421			286				476		816			NT
Arsenic	MMH	Q	Q	0.53			mg/L	0.0108			0.0927				0.00907		0.0358			NT
Cadmium	MMH	Q	Q	0.28			mg/L	0.0013			0.0132				0.00247		0.00517			NT
Chromium	MMH	Q	Q	4.05			mg/L	0.014			0.0355				0.0144		0.0362			NT
Copper	MMH	Q	Q	3.59			mg/L	0.0744			0.205				0.0964		0.441			NT
Cyanide	MMH	Q	Q	0.89			mg/L	<0.005			0.0153				0.0223		0.0236			NT
Lead	MMH	Q	Q	1.13			mg/L	0.0108			0.0462				0.0122		0.0672			NT
Mercury	MMH	Q	Q	0.09			mg/L	0.00018			<0.0001				0.000101		0.000197			NT
Molybdenum	MMH	Q	Q	0.57			mg/L	0.0072			0.116				0.0264		0.0448			NT
Nickel	MMH	Q	Q	3.77			mg/L	0.0228			<.0360				0.0163		0.035			NT
Selenium	MMH	Q	Q	0.68			mg/L	<0.001			<0.0090				<.001		<0.0045			NT
Silver	MMH	Q	Q	0.68			mg/L	<0.2			0.00742				0.00997		0.00247			NT
Zinc	MMH	Q	Q	3.58			mg/L	0.403			2.69				0.981		1.26			NT
O&G, Nonpolar	MMH	Q	Q	50			mg/L	<5.26			23.1				11.7		11.6			NT

Sampling Frequency: C/Continuous, D/Daily, W/Weekly, M/Monthly, Q/Quarterly, S/Semi-Annually, A/Annually, B/Batch
ND = Non Detect, NT = Not Tested, CERT = Certified; COMP/Compliant; NCOMP/Non-Compliant
Metals reported as Total unless otherwise noted
CALC = estimated average daily process flows, calculated from water use data

APPENDIX F: Industrial User Monitoring Summary

		Sampling by POTW		Sampling by IU		Inspections	
SIU/CIU		Performed this year	Planned next year	Permit Required Sampling	Self-Reporting This Year	Performed this year	Planned next year
2023-01	nLight	1	1	12	12	1	1
2023-02	IMAT	1	1	12	12	1	1
2023-03	ProTech	1	1	4	4	1	1
MIU							
2023-01	Oldcastle	0	0	12	12	1	0
2023-02	Waste Connections	0	0	4	4	0	1
2023-03	Andersen Dairy	0	0	0	0	0	0

APPENDIX G: Fats, Oils & Grease (FOG) Program Summary

The Alliance administers a Fats, Oils and Grease (FOG) Program throughout the collection system service areas for Clark Regional Wastewater District and the City of Battle Ground. Staff inspect grease removal devices, review pumpout reports, and provide education and outreach to business owners and personnel. The Alliance also participates in the Preferred Pumper Program (PPP), a regional collaboration between wastewater agencies and grease removal service providers to ensure proper maintenance of grease removal devices.

Active FOG Users	
District	336
Battle Ground	85
Total	**421**
Change from previous year	*23*

Grease Removal Device Types	
Grease Interceptors	387
Oil/Water Separators	40
Total	**427**
Change from previous year	*27*

Compliance Monitoring Activities		
Month	**Facility Inspections**	**PPP Pumpout Reports Reviewed**
January	33	44
February	87	64
March	42	37
April	16	49
May	38	55
June	56	56
July	53	83
August	17	63
September	26	56
October	31	27
November	2	1
December	2	16
TOTAL	**403**	**551**

Preferred Pumper Program Participation	
Active FOG Users currently using PPP pumper:	**241**
Est. gallons of FOG removed by PPP pumpers:	**243,042**

APPENDIX H: Program Modifications

Summary of Changes during the previous Reporting Year:

No changes have been made to the approved program over the previous year.

Staff are in the process of implementing new pretreatment software. The software is currently being used for FOG management, and implementation of the pretreatment module is expected in late 2025.

Summary of Planned Changes in the Upcoming Reporting Year:

The Alliance is evaluating the feasibility of accepting septage at a receiving facility at the City of Battle Ground's Operations Center. The Alliance IPP would require modification and Ecology approval before allowing septage discharge, and IPP staff are communicating with Ecology on this process.

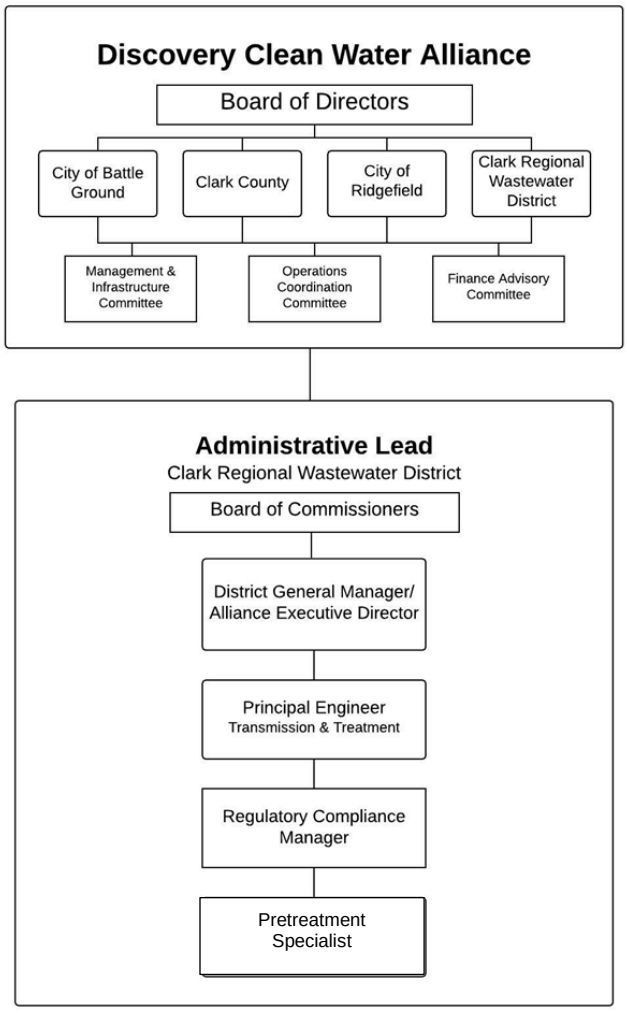
APPENDIX I: Program Resource Summary

PROGRAM ORGANIZATION & PERSONNEL

Clark Regional Wastewater District (District) administers the IPP via the Administrative Lead contract with the Alliance. The District's Regulatory Compliance Manager oversees the management and implementation of all elements of the Alliance IPP. The Pretreatment Specialist also supports the program.

PROGRAM FUNDING

The IPP is funded through the Alliance's operating budget, which is established on a biennial basis. The Alliance Members that contribute flows to the Alliance wastewater treatment facilities (District and the City of Battle Ground) pay regional service charges (RSCs) to the Alliance determined by a flow-based cost allocation framework. The RSCs fund operational and administrative costs for the Alliance, including the IPP.



APPENDIX J: Compliance & Enforcement Summary

Pretreatment Standard or Requirement	No. IUs to which Standard applies	No. IUs in compliance with Standard
IUs notified of promulgated pretreatment standards	0	-
IUs on compliance schedules	0	-
IUs required to submit baseline monitoring reports	0	-
SIUs required to submit self-monitoring reports	3	3
MIUs required to submit self-monitoring reports	2	2
IUs in Significant Non-Compliance (SNC)	0	-

Enforcement Action Type	No. Actions	SIUs	MIUs
Initial Notices	0	-	-
Letters of Non-Compliance	0	-	-
Compliance Review Meetings	0	-	-
Notices of Violation	0	-	-
Consent Orders	0	-	-
Compliance Orders	0	-	-
Emergency Suspension/Termination of Discharge	0	-	-
Civil Penalties	0	-	-